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Attorneys for Plaintiffs

(Attorneys for Defendants listed below)

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

PLANNED PARENTHOOD FEDERATION OF
 AMERICA, INC., et al.;

Plaintiffs,

v.

CENTER FOR MEDICAL PROGRESS, et al.;

Defendants.

Case No. 3:16-cv-00236-WHO

**STIPULATION AND [PROPOSED]
 ORDER FOR EXTENSION OF
 TIME FOR PLAINTIFFS' MOTION
 FOR ATTORNEYS' FEES**

Judge: Hon. William H. Orrick

1 Pursuant to Local Rules 6-2(a) and 7-12, Plaintiffs and Defendants, by and through their
2 respective counsel, stipulate and jointly request the Court to order a 28-day extension to the deadline
3 for Plaintiffs' motion for attorneys' fees following the resolution of the merits appeal in this matter.

4 WHEREAS, pursuant to this Court's March 29, 2023, order, Plaintiffs' motion for attorneys'
5 fees following the resolution of the merits appeal in this matter is presently due 60 days following
6 the issuance of the mandate (Dkt. 1190);

7 WHEREAS, the mandate issued October 18, 2023 (Dkt. 1200), making Plaintiffs' motion
8 for attorneys' fees due December 18, 2023;

9 WHEREAS, Plaintiffs' counsel initially emailed Defendants' counsel on December 6, 2023,
10 in an attempt to resolve any disputes with respect to Plaintiffs' motion for attorneys' fees;

11 WHEREAS, Mr. Mayer, the attorney for Plaintiffs overseeing the motion, was sick during
12 the week of December 11, 2023;

13 WHEREAS, Plaintiffs' counsel and Defendants' counsel have exchanged emails but have
14 not yet had the opportunity to meet and confer regarding Plaintiffs' motion for attorneys' fees;

15 WHEREAS, Plaintiffs' counsel and Defendants' counsel wish to meet and confer and
16 believe that an extension of 28 days will permit them to find a mutually agreeable date and time;

17 WHEREAS, Plaintiffs' counsel and Defendants' counsel believe that such an extension will
18 not otherwise affect any deadlines before this Court;

19 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to a 28-day
20 extension to the deadline for Plaintiffs' motion for attorneys' fees to and including January 15, 2024,
21 such that the Parties, by and through their counsel, may meet and confer regarding the motion.

22 Respectfully submitted,

23 DATED: December 18, 2023

By: /s/ Steven L. Mayer
STEVEN L. MAYER

24
25 *Attorneys for Plaintiffs*
26
27
28

1 DATED: December 18, 2023

2 By: /s/ Peter Breen
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14 *Attorneys for Defendant David Daleiden*

15 DATED: December 18, 2023

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*Attorneys for Defendants the Center for Medical
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DATED: December 18, 2023

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1 DATED: December 18, 2023

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18 DATED: December 18, 2023

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ATTESTATION PURSUANT TO CIVIL L.R. 5.1(i)(3)

As the filer of this document, I attest that concurrence in the filing was obtained from the other signatories.

DATED: December 18, 2023

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Steven L. Mayer
STEVEN L. MAYER

Attorneys for Plaintiffs

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS ORDERED that the deadline for Plaintiffs to file a motion for attorneys' fees is extended by 28 additional days to and including January 15, 2024.

Dated: _____

Hon. William H. Orrick
United States Senior District Judge

CERTIFICATE OF SERVICE

I certify that the foregoing STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE MOTION FOR ATTORNEYS' FEES is being served via the Court's ECF system on December 18, 2023, to all counsel of record who are deemed to have consented to electronic service.

DATED: December 18, 2023

ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ Steven L. Mayer

STEVEN L. MAYER

Attorneys for Plaintiffs